

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

ROBOJAP TECHNOLOGIES LLC, a
Washington limited liability company;
SANDEEP SINGH, an individual; QUATIC
SOFTWARE SOLUTIONS PVT. LTD., a
foreign company; ANUJ SHARMA, an
individual; HITESH KUMAR SACHDEVA,
an individual; SUKHMEET SINGH BAINS,
an individual; and GUREEN PAWAR, an
individual,

Defendants.

No. 2:20-cv-00694-MJP

**JOINT STATUS REPORT AND
STIPULATED MOTION TO
AMEND CASE SCHEDULE**

Plaintiff Amazon.com, Inc. (“Amazon”) and Defendants Robojap Technologies, LLC
 (“Robojap”), Quatic Software Solutions Pvt. Ltd. (“Quatic Software”), and Sandeep Singh (“Singh”),
 (collectively “Defendants”), by and through their counsel of record, jointly submit this status report
 and propose and request that the Court enter an amendment to the Order Setting Trial Date and Related
 Dates (Dkt. # 46) as provided below.

I. Status Report

The parties have worked diligently to conduct fact discovery in this case. As set forth in the Parties' original stipulation to amend the case schedule (*See* Dckt. No. 58), the parties have worked together to effectuate discovery but have since encountered delays due to witness's contraction of the COVID-19 virus in India. On June 9, 2021, Amazon noticed the Fed. R. Civ. P. 30(b)(6) deposition of Robojap for June 21, 2021, and the deposition of Singh for June 22, 2021. On June 10, 2021, counsel for Defendants learned that Singh, Robojap's sole director, has been suffering from lingering side effects of a strain of COVID-19 he contracted in India.¹ These side effects prevent Singh from being able to sit for a deposition.² On June 11, 2021, counsel for Defendants notified Amazon of Singh's illness and that he would not appear for the noticed depositions and would not be available until mid-July at the earliest. As a result, the parties are, unfortunately, again asking for a minor modification of the case deadlines.

II. Proposed Case Schedule

The parties have worked diligently to conduct discovery according to the existing case schedule. Nevertheless, the parties seek additional time to conduct discovery. Accordingly, the Parties propose and request that the Court enter an Order amending the case schedule as provided below.

	Prior [Dckt. 59]	Proposed
All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR7(d))	July 14, 2021	July 31, 2021
Discovery completed by	August 13, 2021	August 27, 2021

///

///

///

///

¹ Declaration of Sandeep Singh

² *Id.*

1 DATED this 22nd day of June 2021

2 DAVIS WRIGHT TREMAINE LLP
3 *Attorneys for Plaintiff*

4
5 By s/ Tim Cunningham
6 Bonnie E. MacNaughton, WSBA #36110
7 Tim Cunningham, WSBA #50224
8 920 Fifth Avenue, Suite 3300
9 Seattle, WA 98104-1610
Phone: 206.622.3150
Fax: 206.757.7700
Email: bonniemacnaughton@dwt.com
timcunningham@dwt.com

10 MDK Law
11 *Attorneys for Defendants*

12 By /s/ James P. Ware
13 James P. Ware, WSBA #36799
14 Dennis R. Kasimov, WSBA #51303
15 MDK Law
16 777 108th Ave NE, Suite 2000
17 Bellevue, Washington 98004
18 Tel.: 425.455.9610
19 Fax: 425.455.1170
20 Email: jware@mdklaw.com
21 dkasimov@mdklaw.com

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

DATED this 23rd day of June 2021.

MARSHA J. PECHMAN
United States Senior District Judge